

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

FARHAD SHAHROKHI,  
*Plaintiff,*

v.

THE UNIVERSITY OF NORTH TEXAS,  
*Defendant.*

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CIVIL ACTION NO. 4:19-CV-00403-ALM

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**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF  
DISCOVERY PERIOD AND REQUEST FOR STATUS CONFERENCE**

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COMES NOW, Plaintiff, DR. FARHAD SHAHROKHI (“Shahrokhi”) and files this Unopposed Motion for Extension of Discovery Period and Request for Status Conference, and show the Court as follows:

This case is set on the Court’s January 2021 trial docket. The current discovery deadline is August 29, 2020.

As previously represented to the Court, both parties have diligently worked on conducting written discovery and engaged in settlement negotiations at mediation in February 2020, prior to incurring the added expenses of depositions. Despite the parties’ good faith efforts, mediation was unsuccessful and the parties were finalizing dates for oral depositions when the outbreak of COVID-19 occurred resulting in social distance guidelines and a travel ban for the Attorney General’s office who is representing Defendant in this case. The Attorney General’s office has been under a travel ban since March 17, 2020 and as of today there is no indication of when the travel ban will be lifted. Further,

the University of North Texas, which is located in Denton, Texas, closed its campus on or around March 19, 2020 and its president directed all but essential employees to comply with the State of Texas Governor's and Denton County Judge's stay-at-home orders. The Governor's orders and UNT's president's directive applied to the plaintiff and defendant-witnesses. The parties do not know definitively how local court reporters and videographers are complying with state and local orders.

Additionally, some of the counsel and clients are in the category or categories of individuals the U.S. Center for Disease Control have identified as being more susceptible to a severe course of COVID-19 if contracted. For these reasons, more time is needed to ensure safe conditions for being able to conduct depositions.

Due to the large number of documents already exchanged by the parties and that the parties anticipate using, conducting depositions by virtual means would not be practicable.

Given the circumstances surrounding the COVID-19 outbreak, Plaintiff seeks an unopposed extension of the discovery deadline to September 30, 2020 and extension of other deadlines currently set in September and October 2020 in the Court's Scheduling Order [Doc #31] accordingly to accommodate the extended discovery period.

Additionally, if the Court thinks it is necessary, the parties are available to discuss the issues and seek the Court's guidance.

This motion is not made for the purpose of delay, but for reason that the interests of justice are served by the relief requested.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing document was served upon the following counsel of record *via* the Court's ECF system on the 3rd day of August, 2020:

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